

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897**

<b>IN RE:</b>	)	
<b>CAMP LEJEUNE WATER LITIGATION</b>	)	
	)	<b>JOINT MOTION FOR ENTRY OF</b>
	)	<b>TRIAL ORDER CONFIRMING THE</b>
	)	<b>25 TRACK 1 TRIAL PLAINTIFFS</b>
<b>This Document Relates To:</b>	)	
<b>ALL CASES</b>	)	

The Plaintiffs’ Leadership Group (the “PLG”) and Defendant United States (together the “Parties”) jointly file this motion for entry of the proposed Trial Order Confirming the 25 Track 1 Trial Plaintiffs. The Court’s Order Regarding Track 1 Trial Plaintiff Selection Protocol (Case Management Order No. 12) provides that after the Parties propose Track 1 Trial Plaintiffs and the PLG secures from those plaintiffs waivers of rights to allege that any illnesses or injuries other than Track 1 Illnesses (and those injuries or conditions stemming from a Track 1 Illness or its treatment) were caused by the water at Camp Lejeune, the Court will enter a “Trial Order confirming the 25 Track 1 Trial Plaintiffs.” *See* D.E 232 at 3. Case Management Order No. 12 also provides “that fact discovery for the Track 1 Trial Plaintiffs, including general discovery, shall conclude 45 days after the PLG obtains the necessary waivers for every selected Track 1 Trial Plaintiff. *Id.* at 2. It further provides that upon entry of such an order, “discovery and all deadlines for Track 1 Discovery Pool Plaintiffs not selected as one of the Track 1 Trial Plaintiffs will be stayed[.]” *Id.* at 3.

The Parties have proposed Track 1 Trial Plaintiffs and the PLG have secured necessary waivers. Therefore, the Parties jointly ask the Court to enter the proposed Trial Order Confirming the 25 Track 1 Trial Plaintiffs which (1) stays the cases of Track 1 Discovery Pool

Plaintiffs that were not selected for trial, (2) confirms the date when fact discovery closes for the selected plaintiffs, and (3) provides for selected plaintiffs to memorialize their claim waivers by amending their short-form complaints to remove waived allegations.

DATED this 28<sup>th</sup> day of June 2024.

Respectfully submitted,

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